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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12 JACQUELINE LAWRENCE, et al.

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14 Plaintiffs,

15 vs.

16 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, et al.

17 Defendants.
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Case No. 2:16-cv-03039-RFB-NJK

(Consolidated with Case No. 2:18-cv-02314-
RFB-CWH)

**DECLARATION OF DALE K. GALIPO
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS
LVMPD, OFC. BOHANON, OFC.
WALFORD, AND OFC. LEDOGAR'S
MOTION FOR SUMMARY JUDGMENT**

DECLARATION OF DALE K. GALIPO

I, Dale K. Galipo, hereby declare as follows:

1. I am an attorney licensed *pro hac vice* to practice law in the United States District Court for the District of Nevada. I am the attorney of record for Plaintiffs in this instant action. I make this declaration in support of Plaintiffs' Opposition to Defendants LVMPD, Ofc. Bohanon, Ofc. Walford, and Ofc. Ledogar's Motion for Summary Judgment. I have personal knowledge of the matters stated herein and could and would testify competently thereto if called.

2. Attached hereto as "**Exhibit 1**" is a true and correct copy of the relevant portions of the October 16, 2018 Deposition Transcript of Robert Bohanon.

3. Attached hereto as "**Exhibit 2**" is a true and correct copy of the relevant portions of the October 16, 2018 Deposition Transcript of Blake Walford.

4. Attached hereto as "**Exhibit 3**" is a true and correct copy of the relevant portions of the November 16, 2018 Deposition Transcript of Brian Montana.

5. Attached hereto as "**Exhibit 4**" is a true and correct copy of the relevant portions of the November 20, 2018 Deposition Transcript of Desiree Sida.

6. Attached hereto as "**Exhibit 5**" is a true and correct copy of the relevant portions of the October 16, 2018 Deposition Transcript of James Ledogar.

7. Attached hereto as "**Exhibit 6**" is a true and correct copy of the relevant portions of the March 7, 2019 Deposition Transcript of Scott DeFoe.

8. Attached hereto as "**Exhibit 7**" is a true and correct copy of the relevant portions of the March 8, 2019 Deposition Transcript of Roger Clark.

9. "**Exhibit 8**" is a true and correct copy of the video recording of the incident from Sergeant Robert Bohanon's bodyworn camera. Exhibit 8 is being filed manually.

10. "**Exhibit 9**" is a true and correct copy of the dispatch radio recording of the incident. Exhibit 9 is being filed manually.

11. Attached hereto as "**Exhibit 10**" is a true and correct copy of a photograph the Keith Childress, Jr.'s cell phone that was taken by the Las Vegas Metropolitan Police Department.

1 12. Attached hereto as “**Exhibit 11**” is a true and correct copy of the relevant portions
2 of the April 18, 2019 Deposition Transcript of John J. Ryan.

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4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct.

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7 DATED: June 26, 2019

LAW OFFICES OF DALE K. GALIPO
LAW OFFICE OF PETER GOLDSTEIN

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10 By /s/ Dale K. Galipo

Dale K. Galipo, Esq.
Peter Goldstein, Esq.
Attorneys for Plaintiffs

Index of Exhibits

1. **Exhibit 1** - Relevant Portions of October 16, 2018 Deposition Transcript of Robert Bohanon
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9. **Exhibit 9** - Dispatch Radio Recording of the Incident
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